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Van Waters & Rogers Inc.

subsidiary of Univar

600 HUNTER DRIVE
OAK BROOK, IL 60521-1926
PHONE (708) 573-4300
FAX (708) 573-2536

CERTIFIED MAIL #P323-114-684
RETURN RECEIPT REQUESTED

November 18, 1991

Director
Missouri Department of Natural Resources
Jefferson State Office Building
205 Jefferson St.
P.O. Box 176
Jefferson City, Missouri 65103

Re: Van Waters & Rogers Inc.
2000 Guinotte Ave.
Kansas City, Missouri 64120
(Jackson County)
EPA I.D. #: MOD 007 158 157

Dear Director:

The above Van Waters & Rogers Inc. facility has interim status authority to store containerized hazardous waste under the Resource Conservation and Recovery Act. The facility also has a full Part B permit application for containerized storage pending with the Missouri Department of Natural Resources. The primary business activity at this facility is industrial chemical warehousing and distribution, SIC Code 5169.

In accordance with 10 CSR 25-7.265 (40 CFR 265.56(j)), Van Waters & Rogers Inc. submits this follow-up written report concerning an incident requiring implementation of the facility's contingency plan. This incident did not arise out of facility hazardous waste storage activities and did not involve a release of hazardous waste. This incident resulted from an aboveground tank piping failure; the tank contained virgin industrial chemical product.

Description of Incident:

Date: September 20, 1991
Time: 9:30am CDT
Material: Hydrochloric Acid (CAS#: 7647-01-0)
Amount: 46,432 pounds



R00362050
RCRA RECORDS CENTER

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A 2-inch length of 3-inch diameter pipe between the unloading outlet of a 4,000 gallon aboveground bulk storage tank and the tank shut-off valve broke, releasing the contents of the storage tank. The storage tank is located inside a tank farm constructed of concrete dike walls and a crushed limestone/limestone gravel floor. Facility emergency coordinator was nearby when the pipe broke, and emergency response was initiated immediately.

Weather conditions at the facility during the incident were favorable. It was a sunny day, the wind was calm, and humidity was approximately 70%.

One Van Waters & Rogers Inc. employee was exposed when the pipe broke. The employee was taken to the hospital for treatment. The employee was treated, released and authorized to return to work by the attending physician on the same day. The Van Waters & Rogers Inc. medical surveillance program will monitor the employee for any adverse long-term health effects resulting from the exposure.

There was no release of liquid hydrochloric acid from the facility. There was minimal release of corrosive vapor from the facility. There was no threat to human health or the environment as a result of the incident.

Description of Emergency Response Efforts:

The Facility Emergency Response Team took immediate action to suppress fumes and minimize release to the air by misting water into the tank farm. At the same time, the Response Team began to apply caustic soda (sodium hydroxide) and soda ash (calcium carbonate) in the area of the release neutralize the hydrochloric acid. The tank farm has a limestone floor which is relatively impervious. The hydrochloric acid and the water being used to suppress corrosive vapors began to pool immediately in the tank farm.

Employees comprising the Emergency Response Team are certified Emergency Responders in accordance with OSHA HAZWOPER standards. In 1990, team members received over 35 hours of Contingency Plan and Emergency Response annual refresher training. Van Waters & Rogers Inc. has a written health and safety program, and emergency response team members participate in a medical surveillance program.

Emergency response efforts (neutralization of the hydrochloric acid) were complete by 4:30pm CDT.

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Description of Clean-up Efforts:

Liquid was pumped a distance of 30 feet from the tank farm to the facility's neutralization unit. The liquid was tested for pH, the pH of the liquid was adjusted as necessary, and the neutralized liquid was released to the municipal combined sanitary/storm sewer system.

Solid precipitate resulting from the neutralization efforts in the tank farm was packaged in U.S. DOT Specification 17-H containers. The solid material is being profiled for treatment/disposal by a RCRA authorized hazardous waste TSDRF.

Reporting:

The release was reported on September 20, 1991 to the following agencies:

Local Emergency Planning Committee at 9:45am CDT; reported to David Garcia.

National Response Center at 11:23am CDT; reported to Ensign Carlin, Report Number 89148.

State Emergency Response Center/Missouri Department of Natural Resources at 11:35am CDT; reported to Dean Martin.

Corrective Actions:

The pipe which failed and the valve have been removed. A new valve has been installed directly on the unloading outlet of the tank. The valve on the unloading outlet is locked shut except during loading or unloading of product, preventing release of tank contents. The new location of the valve allows valve shut-off during a release in the event of a pipe failure beyond the valve. This minimizes the amount of any future potential release.

Consistent with Van Waters & Rogers existing training programs, facility personnel have been oriented to and trained in operating this new valve and tank farm equipment. In accordance with Van Waters & Rogers ongoing inspection procedures, this new tank farm and valve equipment will be regularly inspected for proper functioning and condition.

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Facility Status:

Emergency equipment used to respond to this incident was cleaned and made fit for re-use. Emergency response supplies have been restocked. Operations returned to normal in the affected areas of the facility on September 24, 1991.

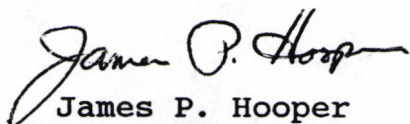
A copy of this report has been placed in the facility's Operating Record.

Van Waters & Rogers Inc. has developed and implemented and continues to improve its risk prevention and emergency preparedness systems. Van Waters & Rogers Inc. implemented its contingency plan and it worked effectively. In the event of emergency, Van Waters & Rogers Inc. has the necessary equipment and trained personnel to respond effectively and to control and contain the emergency as was done in this case.

If you have any questions about this report, please feel free to call me (708-573-4340).

Very truly yours,

VAN WATERS & ROGERS INC.



James P. Hooper
Regulatory Manager
Northern Region

JPH:be

Copies to: U.S. EPA - Region VII
R.D. Hickman, NRO
D. Schneider, AOM
A. Maslow, BOM
S. Schmid, Univar
File

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DEC 09 1991

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subsidiary of **Univar**

PRMT SECTION

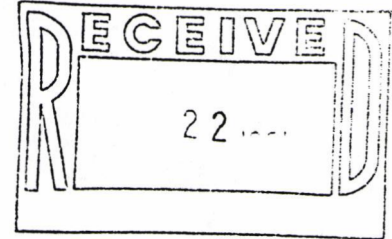
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HAZARDOUS WASTE PROGRAM
MISSOURI DEPARTMENT OF
NATURAL RESOURCES

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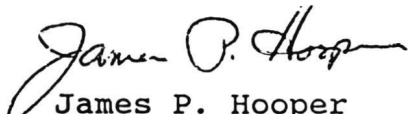
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